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VIA ECF

Hon. Jennifer E. Willis
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, NY 10007

This request is GRANTED. All discovery is stayed pending the outcome of a settlement conference. SO ORDERED.

JENNIFER E. WILLIS
United States Magistrate Judge
December 3, 2024

Re: *Dinis v. N.Y.C. Dep't of Educ. Sch. Dist. et al.*
1:22-cv-7741 (VEC) (JW)

Dear Judge Willis:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, representing Defendants New York City Department of Education School District (“DOE”) and Christina Koza in the above-referenced action. I write to respectfully ask the Court, on behalf of all the parties, to set a date for a settlement conference in this action and grant the parties a stay of discovery through the date of the settlement conference. In the alternative to a full stay of discovery, the parties respectfully ask the Court to extend the close of fact discovery from January 7, 2025 to March 7, 2025. Additionally, in the alternative to a full stay of discovery, the parties respectfully request that the deadline to complete requests for admissions and depositions be extended from December 1, 2024 to January 31, 2025, and the deadline to complete expert discovery be extended from February 7, 2025 to April 8, 2025. This is the second such request by the parties; the first request, made by Defendants on September 25, 2024 and granted on September 26, 2024, was due to the reassignment of this case to the undersigned.

A stay of discovery is requested to allow the parties to dedicate their efforts in this case to preparing for the settlement conference in hopes of a resolution without the need for further discovery or litigation. If the Court does not grant a full stay of discovery, an extension of time is requested because the parties require more time to review, redact, and produce documents. Plaintiff served supplemental discovery demands on October 30, 2024, which included demands for additional e-discovery. Moreover, Defendants only recently received a collection of ESI exceeding 10,000 documents. The requested extension would allow me to properly review each

document we received for production in order to object and respond to Plaintiff's supplemental discovery demands. In addition, the parties would prefer to hold off on taking depositions until e-discovery has been completed, though two depositions are currently scheduled for December 13 and 19, 2024. I accordingly respectfully request an extension of discovery to complete these tasks.

I thank the Court for its consideration and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. E. Smith', with a stylized flourish at the end.

Steven E. Smith
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)